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Attorneys for Defendant Rite Aid Pharmacy

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

RICHARD MORRIS,

Case No. 2:22-cv-00390-HL

Plaintiff,

v.

**DECLARATION OF JESSICA
LANCASTER IN SUPPORT OF
NOTICE OF REMOVAL**

RITE AID PHARMACY, DOES 1, 2, 3, 4, 5,
AND 6,

Defendant.

I, Jessica Lancaster, declare as follows:

1. I am one of the attorneys for Defendant Rite Aid Pharmacy (hereinafter "Defendant"). I make this Declaration in support Defendant's Notice of Removal. This Declaration is based on personal knowledge. I am competent to testify to the matters stated herein.

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2. On February 9, 2022, Plaintiff filed a Complaint in the Circuit Court of Umatilla County, Oregon. Attached to the Defendant's Notice of Removal as Exhibit A is a true and correct copy of the Complaint filed in the state court action.

3. Plaintiff has not yet served Rite Aid Pharmacy with a Summons and Complaint, however, my office retrieved a copy of the Complaint captioned *Richard Morris v. Rite Aid Pharmacy, Does 1, 2, 3, 4, 5, and 6*, Case No: 22CV05138, filed in the Circuit Court for the State of Oregon for the County of Umatilla, State of Oregon, on February 10, 2022, less than 30 days ago.

4. The Complaint (Exhibit A), taken together, constitute all process, pleadings and orders served on the Defendant in the state court action up to the present date.

5. The Defendant is incorporated under the laws of Delaware with its principal place of business in Pennsylvania.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND ACCURATE.

DATED this 10th day of March, 2022.

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UNITED STATES DISTRICT COURT

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PENDLETON DIVISION

RICHARD MORRIS,

Case No. 2:22-cv-00390-HL

Plaintiff,

CERTIFICATE OF SERVICE

v.

RITE AID PHARMACY, DOES 1, 2, 3, 4, 5,
AND 6,

Defendant.

///

I hereby certify that on the 10th day of March, 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered individuals. Additionally, I hereby certify that a true copy of the foregoing

**DECLARATION OF JESSICA LANCASTER IN SUPPORT OF DEFENDANT'S NOTICE
OF REMOVAL** was served as stated below on:

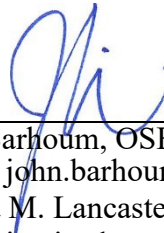
Wade P. Bettis, PhD
Wade P. Bettis PhD PC
1906 4th Street
La Grande, OR 97850
Attorneys for Plaintiff

- ☐ By hand delivery
- ☒ By first-class mail*
- ☐ By overnight mail
- ☐ By facsimile transmission:
Fax #:
- ☒ By e-mail:
wpbettis@bettislaw.com
- ☒ By U.S. District Court CM/ECF e-filing
service to registered parties

*With first-class postage prepaid and deposited in Portland, Oregon.

DATED this 10th day of March, 2022.

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Attorneys for Defendant Rite Aid Pharmacy